

Content Analysis of Public Comment
For the
Interagency Bison Management Plan
For the
State of Montana and Yellowstone National Park

Department of the Interior, National Park Service
Department of Agriculture, U.S. Forest Service
Department of Agriculture, Animal and Plant Health Inspection Service
State of Montana

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INTRODUCTION

BACKGROUND

On June 16, 1998, the Draft Environmental Impact Statement for the Interagency Bison Management Plan for the State of Montana and Yellowstone National Park was released for public review, initiating a formal 120-day comment period. The U.S. Department of the Interior, National Park Service, and the U.S. Department of Agriculture, Forest Service, are the federal lead agencies. The State of Montana is the state lead. The U.S. Department of Agriculture, Animal and Plant Health Inspection Service, is a cooperating agency. The purpose of the proposed interagency action is to maintain a wild, free-ranging population of bison and address the risk of brucellosis transmission to protect the economic interest and viability of the livestock industry in the state of Montana. The draft environmental impact statement examined seven alternative means of minimizing the risk of transmitting the disease brucellosis from bison to domestic cattle on public and private lands adjacent to Yellowstone National Park.

Following requests from the public for more time to review the Draft EIS, the agencies extended the comment period until November 3, 1998. The comment period generated a very large response from the public; 67,520 documents were received containing 212,249 individual comments. Comments were received by letter, electronic-mail, or verbally at a series of public hearings held in 13 cities across the United States. Respondents were very interested in all elements of the Draft EIS and they invested considerable time and effort to voice their opinions and concerns about bison management in the greater Yellowstone area.

This summary introduces the content analysis process used on this project; gives a brief overview of public opinion regarding major topics and issues under which comments were organized; and provides demographic information for the over 212,000 separate comments.

THE CONTENT ANALYSIS PROCESS

Content analysis is a process used to compile and correlate similar comments into a format useable by decision makers and the EIS Team. Content analysis helps the EIS Team organize, clarify, or address technical information pursuant to NEPA regulations, to identify comments which require responses before issuing a Final EIS and Record of Decision.

The type of content analysis used was to manually read each letter and to code the subject matter and whether the comment was in support or opposition to certain issues or alternatives. All comments were considered, whether they were presented by thousands of people saying the same thing or by a single person bringing up a technical point. Emphasis in this process was on the content of the comment rather than the number of times a comment was received. Comment numbers are provided in the Summary of Public Comments.

All comments can be tracked to the original letter and can be sorted and reported in a variety of ways. The Summary of Public Comments section provides a summary of all comments under an issue, plus several specific comments to provide details.

Some terms used in this document are defined below:

Topic. A category of subject matter. These categories were developed through the scoping process and were selected to be able to track major subjects through the DEIS, i.e., Bison, Livestock Operations, Socioeconomics, etc. These topics also served as impact categories in the DEIS.

Issue. Issue areas are subdivisions of Topics. Each topic was broken down into several issues for ease of discussion. For example, the Bison Topic was broken down into over 20 issues such as brucellosis, humane treatment, property damage, etc.

Substantive Comment. Whenever a comment raised an issue of law or regulation, of agency procedure or performance, of compliance with stated objectives, of validity of impact analyses, or other matters of practical or procedural importance, it was considered a substantive comment; one which required a response.

Non-substantive comment. Comments which offered opinions or provided information not directly related to issues or impact analyses were considered non-substantive comments; these comments provided background for the DEIS but did not require a specific response.

SUMMARY OF PUBLIC COMMENTS

Introduction

Comments ranged from very brief appeals to avoid killing any more bison, to very lengthy technical discussions of multiple issues ranging from bison ecology to agency regulations and intergovernmental coordination. The dominant themes of the letters were bison management and the alternatives as presented in the DEIS. Comments also expressed opinions on policy and regulations for the National Park Service, the state of Montana, the Animal and Plant Health Inspection Service, and the USDA Forest Service.

The order of the following topics does not imply importance, but the overall topics of Bison and Alternatives generated more comments than all the remaining topics. The reader should note that the discussion of issues in this document is extrapolated from both summaries of comments and from a review of each comment. The issues discussion contains both interpretations of comments as well as the presentation of representative comments.

In the following section, the topic is followed by a brief summary of the issues within that topic. Numbers of representative comments are presented for each issue area, and certain issues had a qualitative tally made of numbers of people supporting and opposing the issues. The numbers of persons supporting or opposing an issue may not be totally accurate because tabulating the large number of comments may have experienced a margin of error. However, there is a high degree of confidence in the database in which the comments were recorded. Representative comments are presented in each issue area to provide clarification of peoples reactions to the issues, and finally, the document number of the source document for each comment is provided (example, YELL-00000).